



# Oregon

John A. Kitzhaber, M.D., Governor

## Department of Environmental Quality

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August 9, 2000

Drew Gilpin  
Manager Environmental Services  
Oregon Steel Mills, Inc.  
P.O. Box 2760  
Portland, Oregon 97208

**Re: Pre-Remedial Investigation Assessment Work Plan  
Oregon Steel Mills, Inc.  
Portland, Oregon  
ECSI Site 141**

Dear Mr. Gilpin:

The Oregon Department of Environmental Quality (DEQ) has reviewed Pre-Remedial Investigation Assessment Work Plan – Oregon Steel Mills, Inc. – Portland, Oregon Mill. This work plan was prepared by Exponent and was received by DEQ on July 14, 2000. Our comments are presented below:

1. Page 5. Previous Investigations. The Pre-RI report should evaluate and document Oregon Steel Mill's (OSM) investigations of prior releases of hazardous substances. See Comment No. 3.
2. Page 8. Contaminants of Interest (COI). The list of COI should be revised following completion of Tasks 1 and 2 (i.e., after a detailed review of site history, operations & processes, and known spills, releases, etc.) See Comment No. 3.
3. Page 9/10 Tasks 1/2 - Pre-RI Assessment Site Characterization Approach. Oregon Cleanup Rules and the DEQ's preliminary assessment (PA) guidance documents require evaluation of all potential releases of hazardous substances from both current and past operations on the property. The primary objectives of the Pre-RI are 1) to determine if hazardous substances have been released or have the potential to be released at facility; and 2) assess if a release(s) has impacted or has the potential to impact the Willamette River.

Potential contaminant source areas should be identified based on a detailed review of current and historical facility information and the focused collection of environmental samples. The evaluation of source areas should include both upland and over or in water operations that



may have resulted in a release of hazardous substances to soil, groundwater, surface water, and/or Willamette River sediments.

Facility operations/processes should be reviewed and evaluated in accordance with DEQ PA and XPA guidance documents (attached). The PA needs to take a broad approach of what could be present at the site, based on the specific site uses (both current and historical). Sources of information (e.g., Sanborne maps; Spill Prevention and Containment Plans; Storm Water Pollution Prevention Plans; interviews; material safety data sheets; operational manuals; existing local, state, or federal permits or reports (NPDES, storm water, Toxic Reduction Inventory); historical city maps; aerial photographs; historical society photographs and maps; as-built diagrams or construction drawings; historical site plans; historical reverse phone directories; building permit files; and city or county planning files) should be located, reviewed, and evaluated to identify and potential source areas. This review should supplement work performed on potential source areas identified to date. The Pre-RI work plan identifies the following potential contaminant source areas:

- Oil Sump (40's – 60's).
- Ore Storage Pond (Direct Reduction Division [DRD]) 1969-1988.
- EPA identified 14 Solid Waste Management Units (SWMU) – including:
  - ✓ Landfill (SWMU no. 8) – 3 acres, contains mullite, ceramic refractory, furnace slag and mill scale. (Closed under DEQ Solid Waste Permit 1174 in 1996).
- 1985 PCB release near DRD.
- Slabs and soil beneath transformers with PCBs.
- 1996 release from 5,000-gallon gasoline underground storage tank.
- 1997 release of 500-gallon gasoline from above ground storage tank.
- Hydrocarbons in soil near Mosely Shear.
- Metals storage and processing areas.
- PCB spills (areas unidentified).

4. Page 10. Task 4 – Summarize Reasons for No Further Action at Selected Areas of the Facility. The evaluation described in this section should include, but not be limited to, the following elements:

- an evaluation of whether hazardous substances are present in each of the identified potential source areas;
- Summary of available data;
- Regulatory status of each identified area;
- Comparison of available data to preliminary remedial goals (e.g., EPA Region 9) or ecological benchmark values;
- Potential pathways affected; and
- Identification of data gaps.

5. Page 13. Task 6. DEQ concurs that sampling to assess potential releases from the "oil sump" is appropriate. Borings should be advanced within the historical extent of the oil sump to assess the nature of the source materials. Because limited information regarding the "oil sump" is available or has been presented, selected samples should be analyzed for typical waste oil constituents. Specifically selected soil and groundwater samples should be analyzed for volatile organic compounds (VOCs), priority pollutant metals, and polychlorinated biphenyls (PCBs). Additional borings should be located northwest of the oil sump to assess anticipated downgradient groundwater conditions.
6. Page 13. Task 6. It is DEQ's expectation that the Pre-RI will evaluate all upland activities that may have resulted in the release of a hazardous substance. Based on the results of the historical and current facility conditions review (i.e., preliminary assessment), additional sampling may be required to determine if a release has occurred and if a pathway to surface water or sediments exists. If the need for additional sampling is identified by DEQ, a sampling and analyses plan should be prepared and submitted for review and approval. This plan should be based on a revised conceptual site model that describes the potential sources of contamination, migration pathways, exposure routes, and contaminants of interest.
7. Page 15. Task 6 – Surface Sediment Investigation in Vicinity of Storm Water Outfalls. Selected sediment sampling locations should be advanced to depths of at least 90 centimeters to assess potential impacts to site sediments. Sediment cores should be used to assess physical sediment characteristics and whether a release of hazardous substances has occurred from current or past practices. Selected discrete samples should be analyzed for contaminants of interest (See Comment No. 3).
8. Page 16. Task 6 – Surface Sediment Investigation in Vicinity of Storm Water Outfalls. The list of potential analytes should be reviewed and revised, if necessary, following completion of the PA activities. For example, priority pollutant metals should be analyzed unless site specific data is available to demonstrate certain metals can be screened out.
9. Figure 4. Please clarify this figure. It is assumed that the boundaries shown on this map represent on-site storm water drainage basins. Each basin should be labeled, catch basins shown, and primarily storm water flow directions indicated. It is unclear where storm water from the unit containing the scrap yard, cooling pond, and glassification plant is discharged.
10. Figure 2. This figure identifies numerous site features (e.g., Melt Shop, Cooling Pond, Water Treatment Facility, Glassification Shop, Scarfing Yard, Combination Mill Building, Plate Rolling Mill, Storehouse & Maintenance, Surface Processing, etc.). Current or historical operations and processes that use or generate hazardous substances must be identified and described. Potential hazardous substances used in each area should be identified and screened for further evaluation in accordance with Oregon PA guidance. (See Comment No. 3). Figures illustrating the locations of: primary operations and processes; any area (current or historic) where hazardous substances have been used, stored, disposed of, or released should be prepared.

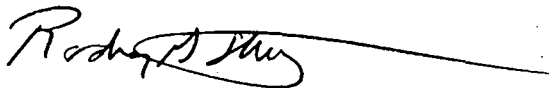
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11. Schedule. DEQ requests that the schedule be revised to include the following:

- Submit Letter Addendum to Work Plan (August 2000);
- Implement Task 6 (August/September 2000);
- DEQ Site Reconnaissance/Tour (August/September 2000);
- Transmit Preliminary Results from Task 6 to DEQ (September 2000);
- Submit Technical Memorandum to DEQ summarizing the findings of Tasks 1 through 4 (October 2000);
- Meeting to discuss the technical memorandum, preliminary results of Task 6, and the path forward
- Draft PreRI Assessment Report (November 2000)

Please do not hesitate to call me at (503) 229-5562 with any questions or concerns.

Sincerely,



Rod Struck  
Project Manager  
Voluntary Cleanup and Portland Harbor Section

cc: David Livermore, Exponent  
Matt McClincy, DEQ/NWR  
ESCI File No. 141